

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

MARTÍN JONATHAN BATALLA
VIDAL, *et al.*,

Plaintiffs,

v.

No. 16-cv-4756 (NGG) (JO)

KIRSTJEN M. NIELSEN, *et al.*,

Defendants.

STATE OF NEW YORK, *et al.*,

Plaintiffs,

v.

No. 17-cv-5228 (NGG) (JO)

DONALD TRUMP, *et al.*,

Defendants.

NOTICE OF FILING OF ADMINISTRATIVE RECORD

Pursuant to the Court’s August 24, 2020 Order, *Batalla Vidal* ECF No. 307, Defendants in the above-captioned matters hereby file the Administrative Record for the memorandum issued by Acting Secretary Chad F. Wolf on July 28, 2020, entitled “Reconsideration of the June 15, 2012 Memorandum Entitled ‘Exercising Prosecutorial Discretion with Respect to Individuals Who Came to the United States as Children.’” Pursuant to the Court’s order, Defendants also file a privilege log for the privileged documents that were directly or indirectly considered by Acting Secretary Wolf in connection with his July 28, 2020 decision.

Dated: September 4, 2020

Respectfully submitted,

DAVID M. MORRELL
Deputy Assistant Attorney General

SETH D. DUCHARME
Acting United States Attorney

BRAD P. ROSENBERG
Assistant Branch Director

/s/ Galen N. Thorp

GALEN N. THORP (VA Bar No. 75517)
Senior Trial Counsel
STEPHEN M. PEZZI (D.C. Bar #995500)
RACHAEL L. WESTMORELAND (GA Bar No.
539498)
Trial Attorneys
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street NW
Washington, DC 20005
Tel.: (202) 514-4781
Fax: (202) 616-8470
Email: galen.thorp@usdoj.gov

JOSEPH A. MARUTOLLO
Assistant U.S. Attorney
United States Attorney's Office
Eastern District of New York
271-A Cadman Plaza East, 7th Floor
Brooklyn, NY 11201
Tel: (718) 254-6288
Fax: (718) 254-7489
Email: joseph.marutollo@usdoj.gov

Counsel for Defendants